

Exhibit A

Plaintiffs' Initial Disclosures

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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

PATTI KLAIR, ROBERT MYERS, ROBERT
BARNES, ERIC CARNRITE, ELIZABETH
HILL-D'ALESSANDRO, ROBERT
TANNEHILL, DITAS TANNEHILL, JOSE
REMENTERIA, TEENA REMENTERIA,
CHARLES BRAUER, LAURA BRAUER,
KAREN MARION, KATHERINE MADERA,
CARL MCQUEARY, LYNN MCQUEARY,
DONALD PATTERSON, KURTIS TRENT
MANNING, TONY SCHAKER, PATRICK
WHITE, HILDEGARD WHITE, QUEST
REALTY TRUST, SECURE STORAGE LLC,
KURTIS TRENT MANNING LIVING
TRUST,

Plaintiffs,

v.

KEVIN LONG; MILLCREEK
COMMERCIAL, LLC; COLLIERS
INTERNATIONAL; ANDREW BELL;
TREVOR WEBER; SPENCER TAYLOR;
BLAKE MCDOUGAL, SCOTT
RUTHERFORD; EQUITY SUMMIT
GROUP; ELEVATED 1031,

PLAINTIFFS' INITIAL DISCLOSURES

Case No. 2:23-cv-00407

Judge Howard C. Nielson, Jr.

Defendants.

By and through undersigned counsel and pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiffs serve these initial disclosures.

Introductory Statement

The following initial disclosures are made based on the information reasonably available to Plaintiffs as of the date hereof, and Plaintiffs reserve the right to amend these disclosures based on facts developed during discovery. By making these disclosures, Plaintiffs do not represent that they are identifying every document, tangible thing, or witness possibly relevant to the lawsuit. Nor do Plaintiffs waive their right to object to the production of any document or tangible thing disclosed herein on the basis of any privilege, the work product doctrine, relevance, undue burden, or any other valid objection. Rather, Plaintiffs' disclosures represent a good faith effort to identify information that Plaintiffs reasonably believe they may use to support their claims.

Plaintiffs disclosures are made without waiving: (1) the right to object on the grounds of competency, privilege, relevance and materiality, hearsay, or any other ground, to the use of any such information, for any purpose, in whole or in part, in any subsequent proceeding in this action or any other action; and (2) the right to object on

any and all grounds, at any time, to any other discovery request or proceeding involving or relating to the subject matter of these disclosures.

All of the disclosures set forth below are made subject to the above objections and qualifications.

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

Name/Contact Information	Subject(s)
Annabelle Barnes Contact through counsel	Annabelle Barnes is a Plaintiff in this action. She is expected to have information regarding the circumstances of her investment in the Keller and Kennesaw properties; communications and documents exchanged with Scott Rutherford, Connie Greenawalt, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and her damages including physical, mental, and emotional suffering.
Robert Barnes Contact through counsel	Robert Barnes is a Plaintiff in this action. He is expected to have information regarding the circumstances of his investment in the Keller and Kennesaw properties; communications and documents exchanged with Scott Rutherford, Connie Greenawalt, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and his damages including

	physical, mental, and emotional suffering.
Charles Brauer Contact through counsel	Charles Barnes is a Plaintiff in this action. He is expected to have information regarding the circumstances of his investment in the Keller property; communications and documents exchanged with Scott Rutherford, Connie Greenawalt, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and his damages including physical, mental, and emotional suffering.
Laura Brauer Contact through counsel	Laura Brauer is a Plaintiff in this action. She is expected to have information regarding the circumstances of her investment in the Keller property; communications and documents exchanged with Scott Rutherford, Connie Greenawalt, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and her damages including physical, mental, and emotional suffering.
Eric Carnrite Contact through counsel	Eric Carnrite is a Plaintiff in this action. He is expected to have information regarding the circumstances of his investment in the Keller property; communications and documents exchanged with Trevor Weber, Kyle Williams, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing

	documents; lease administration agreements and TIC agreements; and his damages including physical, mental, and emotional suffering.
Elizabeth Hill-D'Alessandro Contact through counsel	Elizabeth Hill-D'Alessandro is a Plaintiff in this action. She is expected to have information regarding the circumstances of her investment in the Keller property; communications and documents exchanged with Trevor Weber, Kyle Williams, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and her damages including physical, mental, and emotional suffering.
Patti Klair Contact through counsel	Patti Klair is a Plaintiff in this action. She is expected to have information regarding the circumstances of her investment in the Keller property; communications and documents exchanged with Scott Rutherford, Connie Greenawalt, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and her damages including physical, mental, and emotional suffering.
Katherine Madera Contact through counsel	Katherine Madera is a Plaintiff in this action. She is expected to have information regarding the circumstances of her investment in the Keller property; communications and documents exchanged with Blake McDougal, Max Hanson, Mary Street,

	and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and her damages including physical, mental, and emotional suffering.
Kurtis T. Manning Contact through counsel	Kurtis T. Manning is a Plaintiff in this action. He is expected to have information regarding the circumstances of his investment in the Keller property; communications and documents exchanged with Trevor Weber, Rob Rettinhouse, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and his damages including physical, mental, and emotional suffering.
Karen Marion Contact through counsel	Karen Marion is a Plaintiff in this action. She is expected to have information regarding the circumstances of her investment in the Keller property; communications and documents exchanged with Scott Rutherford, Connie Greenawalt, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and her damages including physical, mental, and emotional suffering.
Carl McQueary Contact through counsel	Carl McQueary is a Plaintiff in this action. He is expected to have information regarding the circumstances of his investment in the

	Keller property; communications and documents exchanged with Spencer Taylor, Max Hanson, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and his damages including physical, mental, and emotional suffering.
Lynn McQueary Contact through counsel	Lynn McQueary is a Plaintiff in this action. She is expected to have information regarding the circumstances of her investment in the Keller property; communications and documents exchanged with Spencer Taylor, Max Hanson, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and her damages including physical, mental, and emotional suffering.
Donald Patterson Contact through counsel	Donald Patterson is a Plaintiff in this action. He is expected to have information regarding the circumstances of his investment in the Keller and Kennesaw properties; communications and documents exchanged with Scott Rutherford, Connie Greenawalt, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and his damages including physical, mental, and emotional suffering.

<p>Robert Myers Contact through counsel</p>	<p>Robert Myers is a Plaintiff in this action. He is expected to have information regarding the circumstances of his investment in the Keller property; communications and documents exchanged with Andrew Bell, Kyle Williams, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and his damages including physical, mental, and emotional suffering.</p>
<p>Jose Rementeria Contact through counsel</p>	<p>Jose Rementeria is a Plaintiff in this action. He is expected to have information regarding the circumstances of his investment in the Keller and Naperville properties; communications and documents exchanged with Andrew Bell, Scott King, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and his damages including physical, mental, and emotional suffering.</p>
<p>Teena Rementeria Contact through counsel</p>	<p>Teena Rementeria is a Plaintiff in this action. She is expected to have information regarding the circumstances of her investment in the Keller and Naperville properties; communications and documents exchanged with Andrew Bell, Scott King, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration</p>

	agreements and TIC agreements; and her damages including physical, mental, and emotional suffering.
Tony Schaker Contact through counsel	Tony Schaker is a Plaintiff in this action. He is expected to have information regarding the circumstances of his investment in the Keller property; communications and documents exchanged with Scott Rutherford, Connie Greenawalt, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and his damages including physical, mental, and emotional suffering.
Ditas Tannehill Contact through counsel	Ditas Tannehill is a Plaintiff in this action. She is expected to have information regarding the circumstances of her investment in the Keller property; communications and documents exchanged with Scott Rutherford, Connie Greenawalt, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and her damages including physical, mental, and emotional suffering.
Robert Tannehill Contact through counsel	Robert Tannehill is a Plaintiff in this action. He is expected to have information regarding the circumstances of his investment in the Keller property; communications and documents exchanged with Scott Rutherford, Connie Greenawalt, Mary Street, and Millcreek, Millrock, or

	Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and his damages including physical, mental, and emotional suffering.
Hildegard White Contact through counsel	Hildegard White is a Plaintiff in this action. She is expected to have information regarding the circumstances of her investment in the Keller property; communications and documents exchanged with Scott Rutherford, Connie Greenawalt, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and her damages including physical, mental, and emotional suffering.
Patrick White Contact through counsel	Patrick White is a Plaintiff in this action. He is expected to have information regarding the circumstances of his investment in the Keller property; communications and documents exchanged with Scott Rutherford, Connie Greenawalt, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and his damages including physical, mental, and emotional suffering.
Quest Realty Trust Contact through counsel	The Quest Realty Trust is a Plaintiff in this action. Representatives of Quest Realty Trust are expected to have information regarding the circumstances of its investment in the

	Keller property; communications and documents exchanged with Scott Rutherford, Connie Greenawalt, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and its damages.
Secure Storage LLC Contact through counsel	Secure Storage LLC is a Plaintiff in this action and is owned by Jose and Teena Rementeria. Representatives of Secure Storage LLC are expected to have information regarding the circumstances of its investment in the Keller and Naperville properties; communications and documents exchanged with Andrew Bell, Scott King, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and its damages.
Kurtis Trent Manning Living Trust Contact through counsel	The Kurtis Trent Manning Living Trust is a Plaintiff in this action and is represented by Kurtis Trent Manning. Representatives of Kurtis Trent Manning Living Trust are expected to have information regarding the circumstances of its investment in the Keller property; communications and documents exchanged with Trevor Weber, Rob Rettinhouse, Mary Street, and Millcreek, Millrock, or Colliers employees; marketing materials; closing documents; lease administration agreements and TIC agreements; and its damages.

<p>Andrew Bell Contact through counsel</p>	<p>Andrew Bell is a Defendant in this action. He is expected to have information regarding the development, marketing, and sale of the TIC interests in this case; communications and documents exchanged with Robert Myers, Jose Rementeria, Kathy Rementeria, and employees and affiliates of Millcreek, Millrock, Colliers, CAMS Realty, and HSH.</p>
<p>Blake McDougal Contact through counsel</p>	<p>Blake McDougal is a Defendant in this action. He is expected to have information regarding the development, marketing, and sale of the TIC interests in this case; communications and documents exchanged with Katherine Madera, and employees and affiliates of Millcreek, Millrock, Colliers, CAMS Realty, and HSH.</p>
<p>Kevin Long Contact through counsel</p>	<p>Kevin Long is a Defendant in this action. He is expected to have information regarding the development, marketing, and sale of the TIC interests in this case; communications and documents exchanged with all Plaintiffs, and employees and affiliates of Millcreek, Millrock, Colliers, CAMS Realty, HSH, and ADP; and knowledge of prior, recent, and ongoing TIC offering schemes by Defendants and co-conspirators similar or identical to those in this case, including the failure of actual and potential tenants, corresponding decreases in investors' property values, and artifices to repurchase and remarket those TIC</p>

	interests, all under circumstances similar to or identical to those in this action.
Scott Rutherford Contact through counsel	Scott Rutherford is a Defendant in this action. He is expected to have information regarding the development, marketing, and sale of the TIC interests in this case; communications and documents exchanged with Robert Barnes, Annabelle Barnes, Charles Brauer, Laura Brauer, Pattie Klair, Karen Marion, Tony Schaker, Robert Tannehill, Ditas Tannehill, Patrick White, Hildegard White, and employees and affiliates of Millcreek, Millrock, Colliers, CAMS Realty, and HSH; and knowledge of prior, recent, and ongoing TIC offering schemes by Defendants and co-conspirators similar or identical to those in this case, including the failure of actual and potential tenants, corresponding decreases in investors' property values, and artifices to repurchase and remarket those TIC interests, all under circumstances similar to or identical to those in this action..
Spencer Taylor Contact through counsel	Spencer Taylor is a Defendant in this action. He is expected to have information regarding the development, marketing, and sale of the TIC interests in this case; communications and documents exchanged with Carl McQueary, Lynn McQueary, and employees and affiliates of Millcreek, Millrock, Colliers, CAMS Realty, and HSH.

<p>Trevor Weber Contact through counsel</p>	<p>Trevor Weber is a Defendant in this action. He is expected to have information regarding the development, marketing, and sale of the TIC interests in this case; communications and documents exchanged with Eric Carnrite, Elizabeth Hill-D'Alessandro, Kurtis T. Manning, and employees and affiliates of Millcreek, Millrock, Colliers, CAMS Realty, and HSH.</p>
<p>Millcreek Commercial Properties LLC (“Millcreek”) Contact through counsel</p>	<p>Millcreek Commercial Properties LLC is a Defendant in this action. Representatives are expected to have information regarding the development, marketing, and sale of the TIC interests in this case; communications and documents exchanged with all of Plaintiffs, and employees and affiliates of Millcreek, Millrock, Colliers, CAMS Realty, HSH, and ADP.</p>
<p>Colliers International (“Colliers”) Contact through counsel</p>	<p>Colliers International is a Defendant in this action. Representatives are expected to have information regarding the development, marketing, and sale of the TIC interests in this case; communications and documents exchanged with all of Plaintiffs, and employees and affiliates of Millcreek, Millrock, Colliers, CAMS Realty, HSH, and ADP.</p>
<p>Equity Summit Group (“Equity Summit”) Contact through counsel</p>	<p>Equity Summit Group is a Defendant in this action. Representatives are expected to have information regarding the development, marketing, and sale of the TIC interests in this case; communications and documents exchanged with Robert Barnes,</p>

	Annabelle Barnes, Charles Brauer, Laura Brauer, Pattie Klair, Karen Marion, Tony Schaker, Robert Tannehill, Ditas Tannehill, Patrick White, Hildegard White, and employees and affiliates of Millcreek, Millrock, Colliers, CAMS Realty, and HSH.
Elevated 1031 (“Elevated”) Contact through counsel	Elevated 1031 is a Defendant in this action. Representatives are expected to have information regarding the development, marketing, and sale of the TIC interests in this case; communications and documents exchanged with Robert Barnes, Annabelle Barnes, Charles Brauer, Laura Brauer, Pattie Klair, Karen Marion, Tony Schaker, Robert Tannehill, Ditas Tannehill, Patrick White, Hildegard White, and employees and affiliates of Millcreek, Millrock, Colliers, CAMS Realty, and HSH.
Millrock Investment Fund 1 Address: 1064 S North County BLVD, Suite 350, Pleasant Grove, UT 84062	Millrock Investment Fund 1 (“Millrock”) is an entity affiliated with Millcreek/Colliers involved in the marketing, sale, and management of Millcreek/Colliers’s TIC properties. Representatives are expected to have information regarding the development of the TIC offerings in this action, the location and vetting of and negotiations with tenant entities including HSH, development of the properties with ADP, efforts to secure a bond, communications and documents exchanged with each of Plaintiffs, communications and documents exchanged with affiliate persons and

	entities such as Millrock and Colliers employees, Mary Street, ADP, HSH and related persons, and others; lease administration agreements; TIC agreements; and the process by which the TIC offerings in this case were marketed and managed.
Millrock Investment Fund 1 Management Address: 1064 S North County Blvd Suite 350 Pleasant Grove, Ut 84062	Millrock Investment Fund Management Fund 1 is an entity affiliated with Millcreek. Representatives are expected to have information regarding the development of the TIC offerings in this action, the location and vetting of and negotiations with tenant entities including HSH, development of the properties with ADP, efforts to secure a bond, communications and documents exchanged with each of Plaintiffs, communications and documents exchanged with affiliate persons and entities such as Millrock and Colliers employees, Mary Street, ADP, HSH and related persons, and others; lease administration agreements; TIC agreements; and the process by which the TIC offerings in this case were marketed and managed.
CAMS Realty Address: 2015 West Grove Parkway Suite J. Pleasant Grove, UT 84062 Phone: 801-358-6279	CAMS Realty is or was the lease administrating company for the Keller, Kennesaw, and Naperville Properties. Representatives are expected to have information regarding Millcreek and Colliers' development of the TIC offerings at issue in this case, the locating and vetting of tenants including HSH, negotiations, agreements, and circumstances of the leases at each of these properties, the state and quality of the properties and

	investments as a whole over time, the management of Plaintiffs' investments, and communications between Plaintiffs and Millcreek/Colliers and their affiliates throughout the investment process.
Mountain West Commercial Real Estate Address: 312 E S Temple St. Salt Lake City, UT 84111 Phone: 801-456-8800	Mountain West Commercial Real Estate was a previous lease administrator for the Kennesaw Property. Representatives are expected to have information regarding Millcreek and Colliers' development of the TIC offerings at issue in this case, the locating and vetting of tenants including HSH, negotiations, agreements, and circumstances of the leases at each of these properties, the state and quality of the properties and investments as a whole over time, the management of Plaintiffs' investments, and communications between Plaintiffs and Millcreek/Colliers and their affiliates throughout the investment process.
Mary Street Address: 6535 N 5750 W American Fork, UT 84003-9727 Email: mstreet@mtnwest.com Phone: 385-233-9415	Mary Street is or was the lease administrator for the leases at the Keller, Kennesaw, and Naperville Properties as well as an agent of CAMS Realty. She is expected to have information regarding Millcreek and Colliers' development of the TIC offerings at issue in this case, the locating and vetting of tenants including HSH, negotiations, agreements, and circumstances of the leases at each of these properties, the state and quality of the properties and investments as a whole over time, the management of Plaintiffs' investments,

	and communications between Plaintiffs and Millcreek/Colliers and their affiliates throughout the investment process.
Bill Street Address: 6535 N 5750 W American Fork, UT 84003-9727 Email: bstreet@mtnwest.com Phone: 801-376-5282	Bill Street is or was the administrator of the leases for several Millcreek/Colliers TIC properties as well as an agent of CAMS Realty. He is expected to have information regarding the negotiations, agreements, and circumstances of the leases at each of these properties, the state and quality of the property and investment as a whole over time, the management of Plaintiffs' investments, and communications between Plaintiffs and Millcreek/Colliers and its affiliates throughout the investment process.
Meagan A. Roush Address: 1601 Airport Freeway Ste 205 (3rd Floor) Eules, TX 76040 Phone: 682-738-3213	Meagan Roush is the attorney involved in the default and eviction of the tenant at the Keller property. She is expected to have information regarding the circumstances surrounding the failure of the Keller property investment, the tenant default, communications with HSH, communications with Millcreek and its affiliated entities and employees, and Mary Street.
Cody Black	Cody Black is believed to be an agent of Mountain West Realty. He is expected to have information regarding communications between CAMS Realty, and Millcreek, Colliers, and their employees and affiliates and their operations relative to the TIC offerings in this case.
Adam Long Address: 6550 S Millrock Dr Ste 200 Salt Lake City Ut 84121	Adam Long is a founding partner of Millcreek Commercial. He is expected to have information regarding the operations and activities of Millcreek

	Commercial; communications with Colliers, Millrock, Mary Street, and their employees or affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and Colliers' marketing materials and efforts relating to the TIC offerings in this case.
Long Holdings, LLC Address: 1064 S North County Blvd Suite 350, Pleasant Grove, UT 84057	Long Holdings, LLC is believed to be an entity associated with Adam Long. It is a member of Millcreek Commercial Properties. Representatives are expected to have information regarding the operations and activities of Millcreek Commercial; communications with Colliers, Millrock, Mary Street, and their employees or affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and Colliers' marketing materials and efforts relating to the TIC offerings in this case.
KGL Real Estate Development PLLC Address: 149 North 980 East Lindon, UT 84042	KGL Real Estate Development PLLC is an entity believed to be associated with Kevin Long. Representatives are expected to have information regarding the operations and activities of Millcreek Commercial; communications with Colliers, Millrock, Mary Street, and their employees or affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and Colliers' marketing materials and efforts relating to the TIC offerings in this case.
GTR Holdings LLC Address: 5047 W Burntside Avenue	GTR Holdings LLC is an entity believed to be associated with Brent Smith.

South Jordan, UT 84009	Representatives are expected to have information regarding the operations and activities of Millcreek Commercial; communications with Colliers, Millrock, Mary Street, and their employees or affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and Colliers' marketing materials and efforts relating to the TIC offerings in this case.
Smart Cove LLC Address: 10306 S Whetstone Cove South Jordan, UT 84009	Smart Cove LLC is an entity believed to be associated with Spencer Taylor. Representatives are expected to have information regarding the operations and activities of Millcreek Commercial; communications with Colliers, Millrock, Mary Street, and their employees or affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and Colliers' marketing materials and efforts relating to the TIC offerings in this case.
Kristian Huff Email: kristian.huff@millcreekcommercial.com Phone: 801-380-5277	Kristian Huff is believed to be an employee of Millcreek. He is expected to have information regarding the operations and activities of Millcreek Commercial; communications with Colliers, Millrock, Mary Street, and their employees or affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and Colliers' marketing materials and efforts relating to the TIC offerings in this case.
Brian Martinez Email:	Brian Martinez is a Senior Associate at Millcreek Commercial. He is expected to have information regarding the

<p>brian.martinez@millcreekcommercial.com Phone: 408-836-3318</p>	<p>operations and activities of Millcreek Commercial; communications with Colliers, Millrock, Mary Street, and their employees or affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and Colliers' marketing materials and efforts relating to the TIC offerings in this case.</p>
<p>Andrew Wolocatiuk Phone: 970-644-2941</p>	<p>Andrew Wolocatiuk is an Associate of Green Ivy Reality. He is expected to have information regarding the operations and activities of Millcreek Commercial; communications with Colliers, Millrock, Mary Street, and their employees or affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and Colliers' marketing materials and efforts relating to the TIC offerings in this case.</p>
<p>John Keiter Phone: 801-633-0559 Email: john@keiterlaw.com Address: 3103 S. 1730 E. Millcreek, UT 84106</p>	<p>John Keiter is Millcreek's general counsel. He is expected to have information regarding the operations and activities of Millcreek Commercial; communications with Colliers, Millrock, Mary Street, and their employees or affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and Colliers' marketing materials and efforts relating to the TIC offerings in this case.</p>
<p>Keiter Law PC Address: 3103 S. 1730 E. Millcreek, UT 84106</p>	<p>Keiter Law PC is Millcreek's general counsel. Representatives of Keiter Law PC are expected to have information regarding the operations and activities of Millcreek Commercial; communications with Colliers,</p>

	Millrock, Mary Street, and their employees or affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and Colliers' marketing materials and efforts relating to the TIC offerings in this case.
Brandon Fugal Phone: 801-947-8328 Email: Brandon.Fugal@colliers.com	Brandon Fugal is the Chairman of the Utah division of Colliers. He is expected to have information regarding the operations and activities of Colliers; communications with Millcreek and its employees and affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and Colliers' marketing materials and efforts relating to the TIC offerings in this case.
Lew Cramer Phone: 801-947-8320 Email: Lew.Cramer@colliers.com	Lew Cramer is the Chief Executive Officer of the Utah division of Colliers. He is expected to have information regarding the operations and activities of Colliers; communications with Millcreek and its employees and affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and Colliers' marketing materials and efforts relating to the TIC offerings in this case.
Spencer Strong Phone: 801-372-1681 Email: Spencer.strong@colliers.com	Spencer Strong is believed to be a representative of Colliers UT. He is expected to have information regarding the operations and activities of Millcreek Commercial; communications with Colliers, Millrock, Mary Street, and their employees or affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and

	Colliers' marketing materials and efforts relating to the TIC offerings in this case.
Spencer Wilson Phone: 801-244-6889 Address: 3926 S Panarama Dr Saratoga Springs, UT 84045	Spencer Wilson is the registered agent for Equity Summit Group. He is expected to have information regarding the operations and activities of Equity Summit Group; communications with Colliers, Millrock, Mary Street, and their employees or affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and Colliers' marketing materials and efforts relating to the TIC offerings in this case.
Patrick Gibson Phone: 615 695 9410 Email: gibson@colliers.com	Patrick Gibson is the Director of Valuation for Colliers Utah. He is expected to have information regarding the operations and activities of Millcreek Commercial; communications with Colliers, Millrock, Mary Street, and their employees or affiliates; the process by which the TIC offerings in this case were developed; and Millcreek and Colliers' marketing materials and efforts relating to the TIC offerings in this case.
Lloyds of London Address: One Lime Street London EC3M 7HA UK Phone: +44 (0)20 7327 1000	Lloyds of London is a premiere insurance and reinsurance market. Representatives are expected to have information regarding the circumstances by which the bond was not secured, including communications with Millcreek, Millrock, Colliers, Talisman Casualty Insurance Company, and their employees, affiliates, and agents.

<p>Talisman Casualty Insurance Company Address: 7881 W Charleston Blvd UNIT 210 Las Vegas, NV 89117 Phone: (800) 318-5317</p>	<p>Talisman Casualty Insurance Company is believed to be the company with which Defendants intended to coordinate the purchase of the bond securing TIC investments in this case. Representatives are expected to have information regarding the circumstances by which the bond was not secured, including communications with Millcreek, Millrock, Colliers, Lloyds of London, and their employees, affiliates, and agents.</p>
<p>Jeffery Keast</p>	<p>Jeffery Keast is an attorney and agent of Talisman Casualty Group. He is expected to have information regarding the circumstances by which the bond was not secured, including communications with Millcreek, Millrock, Colliers, Lloyds of London, and their employees, affiliates, and agents.</p>
<p>Jeff Schaff</p>	<p>Jeff Schaff is believed to be the managing director of Talisman Bonds. He is expected to have information regarding the circumstances by which the bond was not secured, including communications with Millcreek, Millrock, Colliers, Lloyds of London, and their employees, affiliates, and agents.</p>
<p>Healthcare Solutions Holding, Inc. (“HSH”) Address: 26 Reynolds St, Springhill, Louisiana, 71075 US</p>	<p>Healthcare Solutions Holding, Inc. is the tenant company at the Keller, Kennesaw, and Naperville Properties. Representatives are expected to have information regarding the operations and solvency of HSH and its subsidiaries; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty,</p>

	<p>Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; and documents relating to the default process at the Keller, Kennesaw, and Naperville properties.</p>
<p>Healthcare Solutions Management Group, Inc. (“HSMG”)</p>	<p>Healthcare Solutions Management Group, Inc. is the corporate guarantor for the leases at the Keller, Kennesaw, and Naperville Properties. Representatives are expected to have information regarding the operations and solvency of HSH and its subsidiaries; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; and documents relating to the default process at the Keller, Kennesaw, and Naperville properties.</p>
<p>Justin Smith Address: 1779 Cumberland Road Cleveland Heights, OH 44118 Phone: (240) 242-7709 Email: justin.landes@gmail.com</p>	<p>Justin Smith is the Chief Executive Officer of HSMG. He is expected to have information regarding the operations and solvency of HSH and its subsidiaries; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; documents relating to the default process at the</p>

	<p>Keller, Kennesaw, and Naperville properties; and knowledge of prior, recent, and ongoing TIC offering schemes by Defendants and co-conspirators similar or identical to those in this case, including the failure of actual and potential tenants, corresponding decreases in investors' property values, and artifices to repurchase and remarket those TIC interests, all under circumstances similar to or identical to those in this action.</p>
<p>Joshua Constantin Address: 238 Solomon Dr. Suite 303 Slidell, LA 70458-8814 Email: lcajosh1@gmail.com</p>	<p>Joshua Constantin is the head of Commercial Real Estate for HSMG. He is expected to have information regarding the operations and solvency of HSH and its subsidiaries; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; documents relating to the default process at the Keller, Kennesaw, and Naperville properties; and knowledge of prior, recent, and ongoing TIC offering schemes by Defendants and co-conspirators similar or identical to those in this case, including the failure of actual and potential tenants, corresponding decreases in investors' property values, and artifices to repurchase and remarket those TIC interests, all under circumstances</p>

	similar to or identical to those in this action.
Jonathan Loutzenhiser Address: 1409 S Lamar Apartment 237 Dallas, TX 75215 Phone: +1 (866) 668-2188	Jonathan Loutzenhiser is believed to be an Executive Vice President of HSMG. He is expected to have information regarding the operations and solvency of HSH and its subsidiaries; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; and documents relating to the default process at the Keller, Kennesaw, and Naperville properties.
Douglas Millar	Douglas Millar is believed to be an agent of HSH, HSMG, Prospective Jacksonhole Medical, and DMM Advisors. He is expected to have information regarding the operations and solvency of HSH and its subsidiaries; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; and documents relating to the default process at the Keller, Kennesaw, and Naperville properties.
Steve Caton Phone: 815-954-5300 Email: Steve@catoncommercial.com	Steve Caton is the President of SARC USA, contracted by Millcreek/Colliers for the Naperville Property. He is expected to have information regarding

	<p>the operations and solvency of HSH and its subsidiaries; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; documents relating to the default process at the Keller, Kennesaw, and Naperville properties; and knowledge of prior, recent, and ongoing TIC offering schemes by Defendants and co-conspirators similar or identical to those in this case, including the failure of actual and potential tenants, corresponding decreases in investors' property values, and artifices to repurchase and remarket those TIC interests, all under circumstances similar to or identical to those in this action.</p>
<p>Advance Care Medical, Inc. - Naperville LLC Address: 2975 Showplace Dr, Naperville, IL 60564 Phone: 331-529-6513</p>	<p>Advance Care Medical Inc.- Naperville LLC is believed to be an unregistered entity that is an alias, subsidiary or alter ego of HSH, HSMG, or their officers. Representatives are expected to have information regarding the operations and solvency of HSH and its subsidiaries; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; and documents relating to the default</p>

	process at the Keller, Kennesaw, and Naperville properties.
SARC Draper Address: 38 W 13775 S, STE 100, 110, 200, 210, Draper, UT Phone: 801-899-1943	SARC Draper is believed to be an unregistered entity that is an alias, subsidiary or alter ego of HSH, HSMG, or their officers. Representatives are expected to have information regarding the operations and solvency of HSH and its subsidiaries; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; and documents relating to the default process at the Keller, Kennesaw, and Naperville properties.
SARC By HSH Address: 7200 S Hazel St. Pine Bluff, AR 71603-7836 Phone: 870-939-6380	SARC By HSH is believed to be an unregistered entity that is an alias, subsidiary or alter ego of HSH, HSMG, or their officers. Representatives are expected to have information regarding the operations and solvency of HSH and its subsidiaries; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; and documents relating to the default process at the Keller, Kennesaw, and Naperville properties.

<p>Advanced Care Medical By HSI Phone: (866) 668-2188</p>	<p>Advance Care Medical by HSI is believed to be an unregistered entity that is an alias, subsidiary or alter ego of HSH, HSMG, or their officers. Representatives are expected to have information regarding the operations and solvency of HSH and its subsidiaries; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; and documents relating to the default process at the Keller, Kennesaw, and Naperville properties.</p>
<p>SARC by HSI - Keller Tx. Inc. Address: 1220 Keller Parkway, Keller, TX</p>	<p>SARC by HSI – Keller Tx. Inc is believed to be an unregistered entity that is an alias, subsidiary or alter ego of HSH, HSMG, or their officers. Representatives are expected to have information regarding the operations and solvency of HSH and its subsidiaries; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; and documents relating to the default process at the Keller, Kennesaw, and Naperville properties.</p>
<p>Advance Care Medical Kennesaw GA-1 Address: 750 Townpark Ln, Kennesaw, GA 30144</p>	<p>Advance Care Medical Kennesaw GA-1 is believed to be an unregistered entity that is an alias, subsidiary or alter ego</p>

<p>Phone: (404) 365-0966</p>	<p>of HSH, HSMG, or their officers. Representatives are expected to have information regarding the operations and solvency of HSH and its subsidiaries; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; and documents relating to the default process at the Keller, Kennesaw, and Naperville properties.</p>
<p>Advance Care Medical Inc.</p>	<p>Advance Care Medical Inc. is believed to be an unregistered entity that is an alias, subsidiary or alter ego of HSH, HSMG, or their officers. Representatives are expected to have information regarding the operations and solvency of HSH and its subsidiaries; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; and documents relating to the default process at the Keller, Kennesaw, and Naperville properties.</p>
<p>Prospective Jacksonhole Medical</p>	<p>Prospective Jacksonhole Medical is believed to be an unregistered entity that is an alias, subsidiary or alter ego of HSH, HSMG, or their officers that is a receiver of shares of HSMG stock. Representatives are expected to have</p>

	information regarding the operations and activities of Millcreek Commercial; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, other HSH entities, and individuals associated with other HSH entities; documents relating to the process of tenanting a Millcreek/Colliers property; and documents relating to the default process at the Keller, Kennesaw, and Naperville properties.
DMM Advisors	DMM Advisors is believed to have received shares of HSMG stock. Representatives are expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.
Charles Balaban	Charles Balaban is believed to be an agent of HSH, HSMG, and Black Label Services. He is expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.

BLS (Black Label Services)	BLS (Black Label Services) is believed to have received shares of HSMG stock. Representatives are expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.
STIN Marketing	STIN Marketing is believed to have received shares of stock from HSMG. Representatives are expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.
Justin Sarang	Justin Sarang is believed to be an agent of STIN Marketing. He is expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.

168 Capital	168 Capital is believed to have received shares of stock from HSMG. Representatives are expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.
Alex Kozlovski	Alex Kozlovski is believed to be an agent of 168 Capital. He is expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.
Alpha Properties	Alpha Properties is believed to have received shares of stock from HSMG. Representatives are expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.

Tim Rock	Tim Rock is believed to be associated with Alpha Properties. He is expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.
Jolenes Alcantara	Jolenes Alcantara is believed to be the Director and Secretary of Landes Trust and Company from 2019-2020. They are expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.
Robert Stevens	Robert Stevens is believed to have participated in the reverse merger between Verity and HSMG. He is expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.

Stephen Holden	Stephen Holden is believed to be an agent and managing partner of SARC US and SARC Draper. He is expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.
Tyler Ramsey	Tyler Ramsey is believed to be an agent of HSH and HSMG. He is expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.
Eryk Kotapka	Eryk Kotapka is believed to be an operations manager agent of HSH and HSMG. He is expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.

Fredrick Alger Boyer	Frederick Alger Boyer is believed to be an agent of Advance Care Medical. He is expected to have information regarding the relationship between ADP and ACM; the development of the ACM properties and their tenancy; and communications with ADP and its employees and affiliates, Millcreek, Colliers, or their employees and affiliates, and HSH.
ADP-Millcreek 3 LLC	ADP – Millcreek 3 LLC is believed to be a landlord entity for Naperville HSH and Pine Bluff. Representatives are expected to have information regarding the development, management, status, and condition of the Naperville property and lease and communications with Millcreek, Colliers, their employees and affiliates, HSH and its affiliates.
Dr. Joseph Asuncion Address: 11110 Medical Campus Rd, Hagerstown, MD 21742 Phone: (301) 714-4400	Dr. Joseph Asuncion is believed to be President of Advance Care Medical Holdings. He is expected to have information regarding the relationship between ADP and ACM; the development of the ACM properties and their tenancy; and communications with ADP and its employees and affiliates, Millcreek, Colliers, or their employees and affiliates, and HSH.
Dr. Sadeem Mahmoud	Dr. Sadeem Mahmoud is believed to be a doctor in the Pine Bluff Millcreek/Colliers property. He is expected to have information regarding the relationship between ADP and ACM; the development of the ACM properties and their tenancy; and communications with ADP and its employees and affiliates, Millcreek,

	Colliers, or their employees and affiliates, and HSH.
Stanley Teeple	Stanley Teeple is believed to have received shares as a part of HSMG's merger. He is expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.
Matthews Real Estate Phone: 866-889-0550 Email: Contact@matthews.com	Matthews Real Estate is believed to have marketed and developed HSH properties. Representatives are expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.
Kyle Matthews Email: kyle.matthews@matthews.com Phone: +1 (310) 919-5757	Kyle Mathews is believed to have marketed and developed HSH with Matthews Real Estate. He is expected to have information regarding HSH; communications and documents exchanged with HSH and its affiliates or subsidiaries, Millcreek, Colliers, and their affiliates and employees, documents or communications relating to HSH's solvency and operations; and documents or communications relating

	to HSH's relationship and tenancy with Millcreek/Colliers TIC offerings.
American Development Partners ("ADP") Address: P.O. Box 681982 Franklin, TN 37064 Email: info@americandevelopmentpartners.com Phone: 615-368-3412	American Development Partners is a developer company contracted by Millcreek/Colliers for the Keller and Kennesaw Properties. Representatives are expected to have information regarding the development of Millcreek/Colliers TIC offerings,
Emanuel ("Manny") Butera	Emanuel Butera is the owner and operator of ADP. He is expected to have information regarding the development of the Keller and Kennesaw properties; the selection of tenants and lease arrangements; planned and executed construction at the Keller and Kennesaw properties; communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors; and knowledge of prior, recent, and ongoing TIC offering schemes by Defendants and co-conspirators similar or identical to those in this case, including the failure of actual and potential tenants, corresponding decreases in investors' property values, and artifices to repurchase and remarket those TIC interests, all under circumstances similar to or identical to those in this action.

<p>Jamie Butera</p>	<p>Jamie Butera is an employee of ADP, which contracted with Millcreek/Colliers for the Keller and Kennesaw Properties renovations. She is expected to have information regarding the development of the Keller and Kennesaw properties; the selection of tenants and lease arrangements; planned and executed construction at the Keller and Kennesaw properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.</p>
<p>SARC US, Inc.</p>	<p>SARC US, Inc. is a development company contracted by Millcreek/Colliers for the Naperville Property. Representatives are expected to have information regarding the development of the Naperville property; the selection of tenants and lease arrangements; planned and executed construction at the Naperville property; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.</p>
<p>1031 IPX Address: 20 S. Santa Cruz Avenue #208 Los Gatos, CA 95030</p>	<p>1031 IPX is a qualified intermediary for investors making a 1031 exchange. Representatives are expected to have information regarding the process by which Defendants located potential investors and solicited their investments and communications and documents exchanged with Eric Carnrite, Elizabeth Hill-D'Alessandro,</p>

	Robert Myers, Millcreek, Colliers, and their affiliates and employees.
Kyle Williams Address: 2018 156th Avenue NE, Ste 100 Bldg. F Bellevue, WA 98007	Kyle Williams is a qualified intermediary for investors making a 1031 exchange. He is expected to have information regarding the process by which Defendants located potential investors and solicited their investments and communications and documents exchanged with Eric Carnrite, Elizabeth Hill-D'Alessandro, Robert Myers, Millcreek, Colliers, and their affiliates and employees.
Beutler Exchange Address: 215 S State St Ste 280 Salt Lake City, UT 84111	Beutler Exchange is a qualified intermediary for investors making a 1031 exchange. Representatives are expected to have information regarding the process by which Defendants located potential investors and solicited their investments and communications and documents exchanged with Kathy Rementeria, Jose Rementeria, Millcreek, Colliers, and their affiliates and employees.
Mark Adams Address: 215 S State St Ste 280 Salt Lake City, UT 84111	Mark Adams is a qualified intermediary for investors making a 1031 exchange. He is expected to have information regarding the process by which Defendants located potential investors and solicited their investments and communications and documents exchanged with Kathy Rementeria, Jose Rementeria, Millcreek, Colliers, and their affiliates and employees.
Granite Exchange, LLC Address: 5925 Granite Lake Dr. Suite #150 Granite Bay, CA 95746	Granite Exchange LLC is a qualified intermediary for investors making a 1031 exchange. Representatives are expected to have information

	regarding the process by which Defendants located potential investors and solicited their investments and communications and documents exchanged with Kurtis Trent Manning, Millcreek, Colliers, and their affiliates and employees.
Rob Rettinhouse Address: 5925 Granite Lake Dr. Suite #150 Granite Bay, CA 95746	Rob Rettinhouse is a 1031 exchange agent. He is expected to have information regarding the process by which Defendants located potential investors and solicited their investments and communications and documents exchanged with Kurtis Trent Manning, Millcreek, Colliers, and their affiliates and employees.
Accruit Address: 44 Cook St, Suite 530 Denver, CO 80206	Accruit is a qualified intermediary for potential investors in the 1031 exchange process. Representatives are expected to have information regarding the process by which Defendants located potential investors and solicited their investments and communications and documents exchanged with Katherine Madera, Carl McQueary, Lynn McQueary, Millcreek, Colliers, and their affiliates and employees.
Max Hanson Address: 44 Cook St, Suite 530 Denver, CO 80206	Max Hanson is a 1031 agent with Accruit. He is expected to have information regarding the process by which Defendants located potential investors and solicited their investments and communications and documents exchanged with Katherine Madera, Carl McQueary, Lynn McQueary, Millcreek, Colliers, and their affiliates and employees.

<p>Merit Commercial Real Estate Address: 310 East 6th St. Suite 400 Medford, OR 97501 Phone: 541-608-6704</p>	<p>Merit Commercial Real Estate is a broker company involved in the sale of TIC investments in this case. Representatives are expected to have information regarding the process by which Defendants located potential investors and solicited their investments and communications and documents exchanged with Kathy Rementeria, Jose Rementeria, Robert Myers, Millcreek, Colliers, and their affiliates and employees.</p>
<p>Scott King Address: 3757 Windgate St. Medford, OR 97504 Email: scottking@gmail.com Phone: 541-890-6708</p>	<p>Scott King is a broker with Merit Commercial Real Estate. He is expected to have information regarding the process by which Defendants located potential investors and solicited their investments and communications and documents exchanged with Kathy Rementeria, Jose Rementeria, Robert Myers, Millcreek, Colliers, and their affiliates and employees.</p>
<p>Eastern 1031 Starker Exchange, LLC Address: 920 Kunkle's Mill Rd. Lewisberry, PA 17339 Email: starkerexchange@aol.com Phone: 717-308-1031</p>	<p>Eastern 1031 Starker Exchange, LLC is a qualified intermediary for individuals conducting an IRS 1031 exchange. Representatives are expected to have information regarding the process by which Defendants located potential investors and solicited their investments and communications and documents exchanged with Robert Tannehill, Ditas Tannehill, Charles Brauer, Laura Brauer, Patti Klair, Robert Barnes, Annabelle Barnes, Patrick White, Hildegaard White, Karen Marion, Tony Schaker, Donald Patterson, Millcreek, Colliers, and their affiliates and employees.</p>

<p>Connie Greenawalt Address: 100 Spanglers Rd. Lewisberry, PA 17339-8813 Email: connieg123@aol.com Phone: 717-516-2481</p>	<p>Connie Greenawalt is a 1031 exchange agent with Eastern 1031 Starker Exchange, LLC. She is expected to have information regarding the process by which Defendants located potential investors and solicited their investments and communications and documents exchanged with Robert Tannehill, Ditas Tannehill, Charles Brauer, Laura Brauer, Patti Klair, Robert Barnes, Annabelle Barnes, Patrick White, Hildegard White, Karen Marion, Tony Schaker, Donald Patterson, Millcreek, Colliers, and their affiliates and employees; and knowledge of prior, recent, and ongoing TIC offering schemes by Defendants and co-conspirators similar or identical to those in this case, including the failure of actual and potential tenants, corresponding decreases in investors' property values, and artifices to repurchase and remarket those TIC interests, all under circumstances similar to or identical to those in this action.</p>
<p>Olympus 1031, LLC Email: christopher@olympus1031.com Phone: 801-200-3010</p>	<p>Olympus 1031 is a qualified intermediary for investors making a 1031 exchange. Representatives are expected to have information regarding Millcreek and its affiliates' acquisition of the Keller property, communications and documents exchanged with Millcreek, Millrock, Colliers, their affiliates and employees, and at least some prior owners of Millcreek/Colliers TIC offerings.</p>

<p>Old Republic Title Company Address: 3000 Bayport Drive, Suite 1000 Tampa, FL 33607 Phone: 800-328-4441</p>	<p>Old Republic Title Company is a title company that facilitated the closing, purchase, and sale of some TIC investments in this case. Representatives are expected to have information regarding the close, purchase, and sale of TIC investments in this action and communications with Plaintiffs, Millcreek, Colliers, their representatives and affiliates, Mary Street and CAMS Realty, and prior owners of Millcreek/Colliers TIC offerings.</p>
<p>Forest Anthony Address: 470 N 200 E Lindon, UT 84042-1420</p>	<p>Forest Anthony is an agent of Old Republic Title Company. He is expected to have information regarding the close, purchase, and sale of TIC investments in this action and communications with Plaintiffs, Millcreek, Colliers, their representatives and affiliates, Mary Street and CAMS Realty, and prior owners of Millcreek/Colliers TIC offerings.</p>
<p>First American Title Company Address: 1 First American Way Santa Ana, California 92707 Phone: 800-854-3643</p>	<p>First American Title Company is a title company that facilitated the closing, purchase, and sale of some TIC investments in this case. Representatives are expected to have information regarding the close, purchase, and sale of TIC investments in this action and communications with Plaintiffs, Millcreek, Colliers, their representatives and affiliates, Mary Street and CAMS Realty, and prior owners of Millcreek/Colliers TIC offerings.</p>
<p>Jay Thompson Phone: 801-578-8846</p>	<p>Jay Thompson is an employee of First American Title Company. He is</p>

Email: JDTHOMPSON@FIRSTAM.COM	expected to have information regarding the close, purchase, and sale of TIC investments in this action and communications with Plaintiffs, Millcreek, Colliers, their representatives and affiliates, Mary Street and CAMS Realty, and prior owners of Millcreek/Colliers TIC offerings.
Felicia Saez	Felicia Saez is an employee of First American Title Company who facilitated the purchase and sale of the TIC interests that are the subject of this action. She is expected to have information regarding the close, purchase, and sale of TIC investments in this action and communications with Plaintiffs, Millcreek, Colliers, their representatives and affiliates, Mary Street and CAMS Realty, and prior owners of Millcreek/Colliers TIC offerings.
Built-More LLC Address: 275 Jackson Meadows Dr #105 Hermitage, TN 37076 Phone: (615) 915-2075	Built-More LLC is believed to be the primary contractor for ADP with respect to certain property developments in this case. Representatives are expected to have information regarding the development of the TIC properties; the functions of the leases at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Path Construction Address: 125 E Algonquin Rd, Arlington Heights, IL 60005	Path Construction is believed to be the subcontractor in charge of renovating the Keller property. Representatives

Phone: 847-398-7100	are expected to have information regarding the development of the TIC properties; the functions of the leases at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Bill Micho	Bill Micho is believed to be the Path Construction superintendent who oversaw the renovation job at Keller. He is expected to have information regarding the development of the TIC properties; the functions of the leases at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
CESO Inc. Email: 3601 Rigby Road Suite 300 Miamisburg, OH 45342 Phone: 937-435-8584	CESO Inc. is believed to be an architecture company. Representatives are expected to have information regarding the architectural consultation at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Kelly Hiatt	Kelly Hiatt is believed to be a Senior Project Manager for CESO INC. She is expected to have information regarding the architectural developments at the TIC properties; the

	state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Dann Weesner Phone: 817-734-6401	Dann Weesner is believed to have inspected the Keller Property for the City of Keller. He is expected to have information regarding the development of the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Jeromy Sutton	Jeromy Sutton is believed to have inspected the Keller Property for the City of Keller. He is expected to have information regarding the development of the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Darren Williams	Darren Williams is believed to have inspected the Keller Property for the City of Keller. He is expected to have information regarding the development of the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.

John Davis	John Davis is believed to have inspected the Keller Property for the City of Keller. He is expected to have information regarding the development of the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Lynn Patterson	Lynn Patterson is believed to be associated with A-FAB Industries who was subcontracted with Built-More Construction LLC. She is expected to have information regarding the engineering developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
A-FAB Industries Address: 8330 N. Riverside Drive Fort Worth, TX 76244 Phone: (817) 337-4776 Fax: (817) 337-4237	A-FAB Industries is believed to have subcontracted with Built-More Construction LLC. Representatives are expected to have information regarding the engineering developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Scott Anderson	Scott Anderson is an employee of A-FAB Industries who was believed to have subcontracted with Built-More

	Construction LLC. He is expected to have information regarding the engineering developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Unified Door and Hardware Group Address: 1650 Suckle Highway Pennsauken, New Jersey 08110 P: +1 (856) 488-8843 F: +1 (856) 665-7239 Email: info@udhgroup.com	Unified Door and Hardware Group is believed to have subcontracted with Built-More Construction LLC. Representatives are expected to have information regarding the hardware developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Barry Griffies	Barry Griffies is an employee of Unified Door and Hardware Group who was believed to have subcontracted with Built-More Construction LLC. He is expected to have information regarding the hardware developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Southwest Commercial Interiors Address: 2833 Trinity Square Dr # 149, Carrollton, TX 75006 Phone: (972) 416-6700	Southwest Commercial Interiors is believed to have subcontracted with Built-More Construction LLC. Representatives are expected to have

	information regarding the developments of the interior at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Ken Baker Phone: 214-926-4997	Ken Baker is an employee of Southwest Commercial Interiors who is believed to have subcontracted with Built-More Construction LLC. He is expected to have information regarding the developments of the interior at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
BBP Industries Phone: 972-596-4118 Fax: 972-767-4557 Email: INFO@BBPIND.COM	BBP Industries is believed to have subcontracted with Built-More Construction LLC. Representatives are expected to have information regarding the structural developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Mitchell Ziun	Mitchell Ziun is an employee of BBP Industries who is believed to have subcontracted with Built-More Construction LLC. He is expected to have information regarding the

	structural developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Burton Mechanical Address: 2305 Fort Worth St Grand Prairie, TX 75050 Phone: 972-602-7111 Email: jburton@burtonsmi.com	Burton Mechanical is believed to have subcontracted Built-More Construction LLC. Representatives are expected to have information regarding the plumbing developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Charlie Burton	Charlie Burton is an employee of Burton Mechanical who is believed to have subcontracted with Built-More Construction LLC. He is expected to have information regarding the plumbing developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Reliance Electric Address: 160 Inverness Dr West, Suite 400 Englewood, CO 80112 Phone: 720-749-2850 Email: hello@relianceteam.com	Reliance Electric is believed to have subcontracted with Built-More Construction LLC. Representatives are expected to have information regarding the electrical developments at the TIC properties; the state of the construction

	at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Rebecca Barlow	Rebecca Barlow is an employee of Reliance Electric who is believed to have subcontracted with Built-More Construction LLC. She is expected to have information regarding the electrical developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Redline Mechanical	Redline Mechanical is believed to have subcontracted with Built-More Construction LLC. Representatives are expected to have information regarding the HVAC developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Steven Harris	Steven Harris is an employee of Redline Mechanical who is believed to have subcontracted with Built-More Construction LLC. He is expected to have information regarding the plumbing developments at the TIC properties; the state of the construction at the TIC properties; and

	communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Johnny Reyes	Johnny Reyes is believed to be a City of Keller Compliance Officer. He is expected to have information regarding filings, certificates, and other documents relating to the renovations and developments at the Keller Property, including filings in about July 2022 and May 2023.
Tim A. Fleming	Tim A. Fleming is believed to be a City of Keller Plans Examiner. He is expected to have information regarding the developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Benjamin T. Bell	Ben T. Bell is believed to be a City of Keller Designer in Charge. He is expected to have information regarding the developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Arch Consulting Engineers, PLLC	Arch Consulting Engineers, PLLC is believed to be contracted at the Keller Property. Representatives are expected to have information regarding the

	architectural developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Billy Anderson	Billy Anderson is believed to be a structural engineer for Arch Consulting Engineers PLLC listed at the Keller Property. He is expected to have information regarding the architectural developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
HP Engineering	HP Engineering is believed to be the mechanical plumber and electrical engineers that were listed on the Keller permit. These individuals listed are at least but not limited to: Michael Lee Wright, Clinton Burns, Mark Mizell, Eric Harbor, Jon Jacobs, and Zach Archer. Representatives are expected to have information regarding the developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
BBP Painting	BBP Painting is believed to be a contractor that specializes in drywall hired at the Keller Property.

	Representatives are expected to have information regarding the drywall developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
A-FAB Fabrications	A-FAB Fabrications is believed to be a contractor that specializes in steel fabrication. Representatives are expected to have information regarding the structural developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
CAP Concrete	CAP Concrete is believed to be a contractor that specializes in footings and foundations hired at the Keller Property. Representatives are expected to have information regarding the structural developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
TRS Roofing	TRS Roofing is believed to be the contractor that specializes in roofing hired at the Keller Property. Representatives are expected to have information regarding the structural

	developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Impact Fire	Impact Fire is believed to be a contractor that specializes in installing fire alarm systems hired at the Keller Property. Representatives are expected to have information regarding the safety developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
Medgas	Medgas is believed to be the contractor that specializes in installing gas and pipe controls hired at the Keller Property. Representatives are expected to have information regarding the developments at the TIC properties; the state of the construction at the TIC properties; and communications with Kevin Long, Mary Street, and/or other affiliates of Millcreek, CAMS Realty, Millrock, Colliers, HSH and related entities, and other subcontractors.
SCMOB 1220 Keller Pkwy LLC	SCMOB 1220 Keller Pkwy LLC is believed to be the original seller of the Keller Property to Millrock in 2021. Representatives are expected to have information regarding development of Millcreek/Colliers TIC offerings, their sale to prior owners; and

	communications and documents exchanged with Millcreek, Millrock, Colliers, and their employees and affiliates.
Mark Machlis Address: 11309 E Aspen Bend Ln Salt Lake City, UT 84112-7927 Email: bheltd@yahoo.com	Mark Machlis was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Lady Mira Blue Machlis Address: 11309 E Aspen Bend Ln Salt Lake City, UT 84112-7927	Lady Mira Blue Machlis was a prior owner of TIC shares in one or more Millcreek/Colliers properties. She is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
J3 Holdings	J3 Holdings is believed to be a prior owner of TIC shares in one or more Millcreek/Colliers properties. Representatives are expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.

<p>John Alcantara Address: 382 Calabria Ridge St. Las Vegas, NV 89138-4626 Email: kanealii25@gmail.com</p>	<p>John Alcantara was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.</p>
<p>Lonestarboss, LLC Address: 750 3RD ST N STE A La Crosse, WI 54601-6298</p>	<p>Lonestarboss, LLC was a prior owner of TIC shares in one or more Millcreek/Colliers properties. Representatives are expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.</p>
<p>John Bosshard</p>	<p>John Bosshard was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.</p>
<p>Andrew Bosshard Address: W5569 Southdale Dr. La Crosse, WI 54601-7147</p>	<p>Andrew Bosshard was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is</p>

<p>Email: abosshard@bosshardparkelaw.com Phone: 608-788-1788</p>	<p>expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.</p>
<p>VSC Of Texas</p>	<p>VSC Of Texas was a prior owner of TIC shares in one or more Millcreek/Colliers properties. Representatives are expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.</p>
<p>George Park III</p>	<p>George Park III was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.</p>
<p>DKG Management</p>	<p>DKG Management was a prior owner of TIC shares in one or more Millcreek/Colliers properties. Representatives are expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and</p>

	communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Douglas Goldsmith	Douglas Goldsmith was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
JDZ Enterprises Address: 227 Bedford Rd Greenwich, CT, 06831-2647, United States	JDZ Enterprises was a prior owner of TIC shares in one or more Millcreek/Colliers properties. Representatives are expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Diane Zamzok Address: 227 Bedford Rd. Greenwich, CT 06831-2647 Email: deezee32a@aol.com Phone: 203-629-0836	Diane Zamzok was a prior owner of TIC shares in one or more Millcreek/Colliers properties. She is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the

	Keller property, and other employees and affiliates of Millcreek and Colliers.
Henry Hunter Address: 3267 Big Spruce Way Park City, UT 84098-5360 Email: routhousefish@gmail.com Phone: 435-649-3525	Henry Hunter was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Hello Bello, LLC	Hello Bello LLC was a prior owner of TIC shares in one or more Millcreek/Colliers properties. Representatives are expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Samuel Duke Address: 5027 W Burntside Ave South Jordan, UT 84095-6106 Email: sduke0509@gmail.com	Samuel Duke was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.

Three H Ranch, LLC	Three H Ranch LLC was a prior owner of TIC shares in one or more Millcreek/Colliers properties. Representatives are expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Henry Hamilton Hunter	Henry Hamilton Hunter was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Thane Siddoway Address: 5237 S. 2785 W. Rexburg, ID 83440-4429 Email: tsidd@ida.net Phone: 208-359-3017	Thane Siddoway was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
William Sandlin	William Sandlin was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is expected to have information regarding his prior purchase and ownership and

	eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
James Deaton Address: 231 Logan Ranch Rd. Georgetown, TX 78628-1206 Email: edeaton@deatonengineering.com	James Deaton was a prior owner of TIC shares in one or more Millcreek/Colliers properties. They are expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Jennifer Watkins Address: 6688 E 129 th St. S. Bixby, OK 74008-2503 Email: jwatkins@rsu.edu	Jennifer Watkin was a prior owner of TIC shares in one or more Millcreek/Colliers properties. She is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers..
Jennifer Zimmer Address: 2517 W Patterson Ave. Chicago, IL 60618-6078 Email: jzimmer12@yahoo.com	Jennifer Zimmer was a prior owner of TIC shares in one or more Millcreek/Colliers properties. She is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long,

	Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Matthew King Address: 454 Indian Cove Rd Shaw Island, WA 98286-7516	Matthew King was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Happiness LLC	Happiness LLC was a prior owner of TIC shares in one or more Millcreek/Colliers properties. Representatives are expected to have information regarding its prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Gabor Koltai Address: 3390 W Signal Peak Dr. Bldg. PC3 Taylorsville, UT 84129-3910 Email: sasuke29488@yahoo.com	Gabor Koltai was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Wasatch Front Commercial Properties	Wasatch Front Commercial Properties was a prior owner of TIC shares in one

	or more Millcreek/Colliers properties. Representatives are expected to have information regarding its prior purchase and ownership and eventual sale of TIC interests to Plaintiffs and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Bill Carrigan Address: 8091 S. Mountain Oaks Cir. Apt. C Salt Lake City, UT 84121-5932 Email: bcarrigan@smartbuildingsolutions.com Phone: 801-942-2589	Bill Carrigan was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs; information regarding the state of the Keller property during that time; and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Steven Schwartz Address: 7961 S Mountain Oaks Dr. Salt Lake City, UT 84121-5941 Email: stevenschwartz01@gmail.com Phone: 801-942-6290	Steven Schwartz was a prior owner of TIC shares in one or more Millcreek/Colliers properties. He is expected to have information regarding his prior purchase and ownership and eventual sale of TIC interests to Plaintiffs; information regarding the state of the Keller property during that time; and communications and documents exchanged with Kevin Long, Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
Richard Cole Jr.	Richard Cole Jr. is believed to be the realtor that facilitated the sale of the Keller building to Millrock and other

	owners previous to Plaintiffs' purchase that is the subject of this action. He is expected to have information regarding those sales and communications and documents exchanged with Millrock, other prior owners of the Keller property, and other employees and affiliates of Millcreek and Colliers.
William Bozeman Phone: 888-703-8603 Email: Psc@neuragenex.com	William Bozeman is believed to be representative of Neuragenex and Orthogenex and the CEO of Neuragenex. He is expected to have information regarding prospective tenancies at Millcreek/Colliers properties, communications with Mary Street, Kevin Long, Millrock, and other Millcreek or Colliers affiliates or employees; documents relating to Neuragenex's tenancy or prospective tenancy; and the vetting procedures for tenancy at Millcreek/Colliers TIC locations.
Neuragenex Phone: 888-703-8603 Email: Psc@neuragenex.com	Neuragenex is believed to have been a tenant or a prospective tenant for various Millcreek/Collier properties. Representatives are expected to have information regarding prospective tenancies at Millcreek/Colliers properties, communications with Mary Street, Kevin Long, Millrock, and other Millcreek or Colliers affiliates or employees; documents relating to their tenancy or prospective tenancy; and the vetting procedures for tenancy at Millcreek/Colliers TIC locations.
Lance Goudzwaard Phone: 888-703-8603 Email: Psc@neuragenex.com	Lance Goudzwaard is believed to be a representative of Neuragenex and Orthogenex. He is expected to have information regarding prospective

	tenancies at Millcreek/Colliers properties, communications with Mary Street, Kevin Long, Millrock, and other Millcreek or Colliers affiliates or employees; the financial stability of prospective tenants; and the vetting procedures for tenancy at Millcreek/Colliers TIC locations.
Dr. Guarav Aggarwala, M.D.	Dr. Guarav Aggarwala, M.D. is believed to be a doctor representing a prospective tenant at the Keller property. He is expected to have information relating to his prospective tenancy at the Keller property including documents and communications exchanged with Mary Street, Kevin Long, Millrock, other employees or affiliates of Millrock and Colliers, HSH and affiliated persons or entities; and the vetting procedures for tenancy at Millcreek/Colliers TIC locations.
Securities Exchange Commission	The Security Exchange Commission is a federal agency tasked with enforcing federal securities laws. Representatives are expected to have information regarding the existence or status of registrations, filings, or other security-related documents related to Millcreek/Colliers TIC offerings.
Alta Bank	Alta Bank is believed to have facilitated the purchase and sale of the Keller property to the plaintiffs from November 2022 to February 2022. Representatives are expected to have information regarding the closing of Plaintiffs' purchases of TIC shares; communications with Plaintiffs, Millrock, Millcreek, Kevin Long, Mary Street, and other affiliates or employees

	of Millcreek and Colliers; and financial documents relating to purchases of TIC interests at the Keller property.
Glacier Bank Address: 49 Commons Loop, Kalispell, Montana, 59901-2679 406 7517708 Email: www.glacierbancorp.com	Glacier Bank is a bank that is believed to have facilitated the purchase and sale of the Keller property from March 2022 and later. Representatives are expected to have information regarding the closing of Plaintiffs' purchases of TIC shares; communications with Plaintiffs, Millrock, Millcreek, Kevin Long, Mary Street, and other affiliates or employees of Millcreek and Colliers; and financial documents relating to purchases of TIC interests at the Keller property.
Glacier Commercial Realty LP Address: 1807 Keller Pkwy Suite 200 Keller, TX 76248 Phone: (214) 637-4300	Glacier Commercial Realty LP is a commercial real estate agency. Representatives are expected to have information including a broker's opinion regarding the fair market value of the Keller property and communications with Plaintiffs, Millrock, Kevin Long, Mary Street, or other employees or affiliates of Millcreek and Colliers.
Steve Shrum Phone: 214-637-4300 Email: Shrum@glaciercommercial.com	Steve Shrum is a broker at Glacier Commercial Realty. He is expected to have information including a broker's opinion regarding the fair market value of the Keller property and communications with Plaintiffs, Millrock, Kevin Long, Mary Street, or other employees or affiliates of Millcreek and Colliers.
CBRE Address: 2100 McKinney Avenue, Suite 1250 Dallas, TX 75201	CBRE is a commercial real estate broker that provided a broker's opinion for the value of the Kennesaw Property. Representatives are expected to have information including a broker's

	opinion regarding the fair market value of the Kennesaw property and communications with Plaintiffs, Millrock, Kevin Long, Mary Street, or other employees or affiliates of Millcreek and Colliers.
Adam Butler Phone: 404-923-1257 Email: Adam.butler@cbre.com Address: 3550 Lenox Road NE Suite 2300 Atlanta, GA 30326	Adam Butler is a broker at CBRE. He is expected to have information including a broker's opinion regarding the fair market value of the Kennesaw property and communications with Plaintiffs, Millrock, Kevin Long, Mary Street, or other employees or affiliates of Millcreek and Colliers.
SK Commercial Realty Address: 900 Circle 75 Parkway, Suite 720 Atlanta, Georgia 30339	SK Commercial Realty is a commercial broker in the Atlanta, Georgia area. Representatives are expected to have information including a broker's opinion regarding the fair market value of the Kennesaw property and communications with Plaintiffs, Millrock, Kevin Long, Mary Street, or other employees or affiliates of Millcreek and Colliers.
Jeff Fortner Phone: 770-771-5534 Email: Jfortner@skcr.com	Jeff Fortner is a broker at SK Commercial Realty who provided a broker's opinion for the value of the Kennesaw Property. He is expected to have information including a broker's opinion regarding the fair market value of the Kennesaw property and communications with Plaintiffs, Millrock, Kevin Long, Mary Street, or other employees or affiliates of Millcreek and Colliers.
Stream Capital Partners Address: 4201 West Irving Park Road Suite 200 Chicago, IL 60641	Stream Capital Partners is a lease advisory group who provided a broker's opinion for the value of the Kennesaw Property. Representatives are expected

Phone: 312-899-6664) Email: info@stream-cp.com	to have information including a broker's opinion regarding the fair market value of the Kennesaw property and communications with Plaintiffs, Millrock, Kevin Long, Mary Street, or other employees or affiliates of Millcreek and Colliers.
Sasha Dominguez Email: Sasha@stream-cp.com	Sasha Dominguez is a broker at Steam Capital Partners. She is expected to have information including a broker's opinion regarding the fair market value of the Kennesaw property and communications with Plaintiffs, Millrock, Kevin Long, Mary Street, or other employees or affiliates of Millcreek and Colliers.
O'Kelley & Sorohan Attorneys at Law LLC Address: 2170 Satelite Blvd Ste 375 Duluth GA 30097 Phone: 770 497 1880	O'Kelley & Sorohan Attorneys at Law LLC are believed to be an attorney's office involved in the purchase and sale of the Kennesaw property. Representatives are expected to have information including communications with Millrock, Kevin Long, and other employees or affiliates of Millcreek or Colliers; and documents and communications relating to the purchase and sale of TIC interests in the Kennesaw property to Plaintiffs or others.

II. DOCUMENTS AND ESI

Defendants anticipate offering the following categories of documents and things in their possession or control:

- Marketing materials, descriptions, papers, articles, presentations, and other written and electronic materials relating to the TIC investments offered by Millcreek and Colliers;
- Communications between Plaintiffs and Defendants relating to Plaintiffs' TIC investments, both prior to and after the close of their TIC purchases, and documents related thereto;
- Communications between Plaintiffs and third parties regarding the process by which they invested in the TIC interests offered by Millcreek and Colliers;
- Documents relating to the closing of Plaintiffs' TIC investments;
- Communications between Plaintiffs and affiliates of Defendants, including Millrock Investment Fund I, CAMS Realty, and Mary Street, and documents related thereto;
- Lease agreements and other contracts relating to the TIC investments;
- Documents and communications relating to Millcreek's and Colliers' business models, marketing efforts, and operations;
- Plaintiffs' medical records evidencing harm caused by Defendants' actions;
- Documents relating to construction or renovations at TIC properties offered by Millcreek and Colliers;
- Documents relating to equipment purportedly purchased for use at the TIC properties offered by Millcreek and Colliers;
- Photographs and audio and/or visual recordings of and relating to the properties offered by Millcreek and Colliers;
- Documents and communications relating to the bond purportedly secured through Lloyd's of London;
- Documents from ongoing and past litigation and regulation actions involving the Defendants and/or their affiliates.

III. COMPUTATION OF DAMAGES

Discovery is ongoing and the exact calculations of Plaintiffs' damages are not yet known. These damages involve complex damages principles and theories, and will therefore be calculated by damages experts, whose opinions will be disclosed in expert discovery. Pursuant to Rule 26(a)(1)(A)(iii) of the Federal

Rules of Civil Procedure, Plaintiffs make the following preliminary damages disclosures:

Plaintiffs seek the amounts they paid for the properties (**Purchase Payments**), or the value of the projected income stream over the duration of the original twenty-year lease and the residual value of the property at the conclusion of the lease period; less what they received back (**Actual Property Value**); plus costs related to selling their interest in the properties (**Cost of Getting Out**); plus prejudgment interest (**Prejudgment Interest**); plus lease administration fees (**CAMS Fees**); plus cost of unforeseen management of the property (**Self-Management Costs**); plus misappropriated draw funds (**Construction Draws**); plus tax penalties (**Tax Penalties**); plus attorney's fees, costs, and expenses of litigation (**Litigation Costs**); plus punitive damages (**Punitive Damages**), plus statutory penalties (**Statutory Penalties**); plus compensatory damages in the form of **Special Medical Damages** and **General Damages**; plus other damages categories and computations to be supplemented in due course.

- **Purchase Payments.** All amounts Plaintiffs paid for the Keller, Naperville, and Kennesaw properties, totaling approximately \$8,539,647.31, separated by each Plaintiff as follows (with Purchase Dates):
 - o Robert and Annabelle Barnes invested approximately \$502,128.14 in the Keller Property (February 4, 2022);
 - o Eric Carnrite and Elizabeth Hill-D'Alessandro invested approximately \$640,430 in the Keller Property (May 3, 2022);
 - o Charles and Laura Brauer invested approximately \$660,899.13 in the Keller Property (April 21, 2022);
 - o Teena and Jose Rementeria invested approximately \$566,000 in the Keller Property (July 26, 2021);
 - o Patti Klair invested approximately \$836,957.35 in the Keller Property (February 4, 2022);
 - o Robert Myers invested approximately \$400,000 in the Keller Property (April 6, 2022);
 - o Karen Marion invested approximately \$300,000 in the Keller Property (April 15, 2022);

- o Robert and Ditas Tannehill invested approximately \$449,318.19 in the Keller Property (July 20, 2021);
- o Katherine Madera invested approximately \$477,000 in the Keller Property (October 26, 2021);
- o Patrick and Hildegard White invested approximately \$194,679.89 in the Keller Property (April 22, 2022);
- o Tony Schaker invested approximately \$804,354 in the Keller Property (January 21, 2022);
- o Carl and Lynn McQueary invested approximately \$200,000 in the Keller Property (December 27, 2021);
- o Donald Patterson invested approximately \$614,581.21 in the Keller Property (March 31, 2022);
- o Kurtis Trent Manning invested approximately \$817,581.21 in the Keller Property;
- o Robert and Annabelle Barnes invested approximately \$232,800 in the Kennesaw Property (April 202, 2022);
- o Donald Patterson invested approximately \$232,800 in the Kennesaw Property (March 31, 2022);
- o Secure Self Storage LLC, invested approximately \$160,800 in the Naperville Property (July 26, 2021).
- **Actual Property Value.** The Actual Property Value is no greater than \$4,120,963 (the Tarrant County Tax Assessor's "Appraised Value"), discounted by a properties' lack of marketability (DL0M) and lack of liquidity of the TIC Interest (DL0L). The value is further discounted by the **TIC Interest**. The DL0M and DL0L are within the realm of expert opinion and will be disclosed when it becomes available during the expert discovery phase of this case. Due to the complex nature of this case, additional discounts and valuation principles will be supplemented with the aid of expert witnesses during expert discovery.
- **Cost of Getting Out.** This includes the costs to renovate the properties, surgical center equipment, advertising, and closing costs. These damages are ongoing. Plaintiffs will supplement this disclosure when information becomes available.
- **Prejudgment Interest.** Interest accruing from the Purchase Date of the Purchase Payments.
- **CAMS Fees.** All amounts paid to CAMS Realty, which are ongoing and will be produced in supplemental disclosures.

- **Self-Management Costs.** Lost income and out of pocket expenses associated with the unforeseen management of the properties they purchased. These damages are ongoing, but include time spent at a reasonable property management rate, property maintenance, locksmith fees, security fees. Plaintiffs will supplement this disclosure when information becomes available.
- **Construction Draws.** Funds sent to Jameson, LLC, for the alleged purpose of development and construction of the properties, in an amount not less than \$9,381,669.99, discounted by the TIC Interest.
- **Tax Penalties.** Funds lost related to any state or federal tax agency claims against Plaintiffs concerning the 1031 exchange status of the properties, including all taxes, assessments, interest, fines, penalties, attorneys' fees, and litigation costs. These damages are ongoing. Plaintiffs will supplement this disclosure when information becomes available.
- **Special Medical Damages.** These damages are ongoing. Plaintiffs will supplement this disclosure when information becomes available.
- **General Damages,** including but not limited to mental suffering, loss of enjoyment of life, which Plaintiffs believe will be greater than \$2 million. Noneconomic damages are not capable of being exactly measures, and there is no fixed rule, standard, or formula for them. At trial, Plaintiffs will ask the jury to award noneconomic damages in an amount of money that will fairly and adequately compensate Plaintiffs for losses and damages other than economic losses. These damages are ongoing.
- **Litigation Costs.** Plaintiffs engaged the law firm of Deiss Law PC to represent them in connection with claims they have asserted in this case. Plaintiffs agreed to pay all litigation costs incurred in connection with this case. Plaintiffs have also agreed to pay reasonable attorney's fees. These fees and costs are recoverable as damages in this action. These damages are ongoing.
- **Punitive Damages.** As this amount is not subject to a computation, no calculation is provided. Plaintiffs believe the amount is not less than \$20 million.
- **Unjust Enrichment.** Disgorgement of Defendants' profits based on a reasonable approximation of Defendants' ill-gotten gains, which include but are not limited to the following:
 - o Colliers commissions of at least \$103,932.61.
 - Barnes commission: \$2,663.85
 - Brauer commission: \$6,608.99

- Carnrite/Hill-D'Alessandro commission: \$25,617.20
- Klair commission: \$8,369.58
- Madera commission: \$19,106.40
- Manning commission: \$9,650.79
- Marion commission: \$3,000
- McQueary commission: \$8,000
- Patterson commission not available at this time.
- Myers commission: \$4,705.88
- Rementeria commission: \$6,678.80
- Schaker commission: \$3,061.14
- Tannehill commission: \$4,493.18
- White commission: \$1,976.80
- o Millcreek marketing fees of at least \$127,920.10.
 - Barnes fee: \$7,992.00
 - Brauer fee: \$19,826.97
 - Carnrite/Hill-D'Alessandro fee: \$19,219.90
 - Klair fee: \$8,369.58
 - Madera fee: \$9,553.20
 - Manning fee: \$14,885.11
 - Marion fee: \$9,000
 - McQueary fee: \$4,000
 - Patterson fee not available at this time.
 - Myers fee: \$11,294.42
 - Rementeria fee: \$10,301.20
 - Schaker fee: \$3,061.14
 - Tannehill fee: \$4,493.18
 - White fee: \$5,930.40
- o Equity Summit Group commissions in the amount of at least \$104,000.58.
 - Barnes commission: \$7,992
 - Brauer commission: \$19,826.97
 - Klair commission: \$25,108.73
 - Marion commission: \$9,000
 - Patterson commission not available at this time.
 - Schaker commission: \$9,183.42
 - Tannehill commission: \$26,959.06
 - White commission: \$5,930.40

- **Statutory Penalties.** State and federal penalties pursuant to the statutory claims alleged in the operative complaint filed in this action. All computations are set forth by Congress and the respective state legislatures and will be applied accordingly.
- **TIC Interest.** Plaintiffs' respective ownership interest is calculated as follows:
 - o Barnes (Keller): 2.3531%
 - o Carnrite/Hill-D'Alessandro (Keller): 3.0015%
 - o Brauer (Keller): 3.0974%
 - o Rementeria (Keller): 2.6527%
 - o Klair (Keller): 3.9226%
 - o Myers (Keller): 1.8747%
 - o Marion (Keller): 1.4060%
 - o Tannehill (Keller): 2.1058%
 - o Madera (Keller): 2.2368%
 - o White (Keller): 0.9265%
 - o Schaker (Keller): 3.7698%
 - o McQueary (Keller): 0.9373%
 - o Patterson (Keller): 2.8803%
 - o Manning (Keller): 3.8331%
 - o Barnes (Kennesaw): 4.1928%
 - o Patterson (Kennesaw): 5.4218%
 - o Secure Self Storage LLC (Naperville): 3.0249%

Plaintiffs incorporate by reference all their responses to written discovery requests, deposition testimony, and any other representations about Plaintiffs' damages disclosed to the Defendants during fact and expert discovery. Plaintiffs reserve the right to supplement these disclosures as information becomes available.

IV. INSURANCE AGREEMENTS

At this time Plaintiffs are not aware of any insurance agreements or policies under which another party may be liable to satisfy part or all of a judgment entered in this action or to indemnify or reimburse for payments made to satisfy a judgment.

Plaintiffs reserve the right to supplement this response if additional information becomes available.

DATED this February 8, 2024.

DEISS LAW, P.C.

/s/ Andrew G. Deiss

Andrew G. Deiss

Corey Riley

Attorneys for Plaintiffs